SERFF Tracking #: MUTA-130803341 State Tracking #:

Company Tracking #: AARON ZIMMER

State: District of Columbia Filing Company: Mutual of Omaha Insurance Company

TOI/Sub-TOI: MS02I Individual Medicare Supplement - Pre-Standardized/MS02I.000 Medicare Supplement - Pre-

Standardized

Product Name: 2017 MOO PreStandardized Med Supp **Project Name/Number:** 2017 Annual Rate Filing/2017 MOO

Filing at a Glance

Company: Mutual of Omaha Insurance Company
Product Name: 2017 MOO PreStandardized Med Supp

State: District of Columbia

TOI: MS02I Individual Medicare Supplement - Pre-Standardized

Sub-TOI: MS02I.000 Medicare Supplement - Pre-Standardized

Filing Type: Rate

Date Submitted: 11/11/2016

SERFF Tr Num: MUTA-130803341
SERFF Status: Submitted to State

State Tr Num:

State Status:

Co Tr Num: AARON ZIMMER

Implementation 04/01/2017

Date Requested:

Author(s): Aaron Zimmer

Reviewer(s):

Disposition Date:
Disposition Status:
Implementation Date:

SERFF Tracking #: MUTA-130803341 State Tracking #:

Company Tracking #: AARON ZIMMER

State: District of Columbia Filing Company: Mutual of Omaha Insurance Company

TOI/Sub-TOI: MS02I Individual Medicare Supplement - Pre-Standardized/MS02I.000 Medicare Supplement - Pre-

Standardized

Product Name: 2017 MOO PreStandardized Med Supp **Project Name/Number:** 2017 Annual Rate Filing/2017 MOO

General Information

Project Name: 2017 Annual Rate Filing Status of Filing in Domicile: Not Filed

Project Number: 2017 MOO Date Approved in Domicile:

Requested Filing Mode: Review & Approval Domicile Status Comments: A filing will be submitted to

Nebraska, our state of domicile, in the near future.

Explanation for Combination/Other: Market Type: Individual Submission Type: New Submission Individual Market Type:

Overall Rate Impact: 3% Filing Status Changed: 11/11/2016

State Status Changed:

Deemer Date: Created By: Aaron Zimmer

Submitted By: Aaron Zimmer Corresponding Filing Tracking Number:

Filing Description:

2017 PreStandardized Medicare Supplement Annual Loss Ratio and Rate Adjustment Filing

Company and Contact

Filing Contact Information

Aaron Zimmer, aaron.zimmer@mutualofomaha.com

Mutual of Omaha Plaza 402-351-2305 [Phone]

Omaha, NE 68175

Filing Company Information

Mutual of Omaha Insurance CoCode: 71412 State of Domicile: Nebraska Company Group Code: 261 Company Type: Health

3300 Mutual of Omaha Plaza Group Name: Insurance

Omaha, NE 68175 FEIN Number: 47-0246511 State ID Number:

(402) 351-2304 ext. [Phone]

Filing Fees

Fee Required? No Retaliatory? No

Fee Explanation:

SERFF Tracking #: MUTA-130803341 State Tracking #: Company Tracking #: AARON ZIMMER

State: District of Columbia Filing Company: Mutual of Omaha Insurance Company

TOI/Sub-TOI: MS021 Individual Medicare Supplement - Pre-Standardized/MS021.000 Medicare Supplement - Pre-Standardized

2017 MOO PreStandardized Med Supp Product Name: Project Name/Number: 2017 Annual Rate Filing/2017 MOO

Rate Information

Rate data applies to filing.

Filing Method: **SERFF**

Rate Change Type: Increase

Overall Percentage of Last Rate Revision: 3.000% **Effective Date of Last Rate Revision:** 04/01/2016

SERFF

Filing Method of Last Filing:

Company Rate Information

Company	Overall % Indicated	Overall % Rate	Written Premium Change for	Number of Policy Holders Affected	Written Premium for	Maximum % Change	Minimum % Change
Name:	Change:	Impact:	this Program:	for this Program:	this Program:	(where req'd):	(where req'd):
Mutual of Omaha Insurance Company	3.000%	3.000%	\$298	2	\$9,947	3.000%	3.000%

SERFF Tracking #: MUTA-130803341 State Tracking #: Company Tracking #: AARON ZIMMER

 State:
 District of Columbia

 Filing Company:
 Mutual of Omaha Insurance Company

TOI/Sub-TOI: MS02I Individual Medicare Supplement - Pre-Standardized/MS02I.000 Medicare Supplement - Pre-Standardized

Product Name:2017 MOO PreStandardized Med SuppProject Name/Number:2017 Annual Rate Filing/2017 MOO

Rate/Rule Schedule

Item No.	Schedule Item Status	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments
1		2017 Rates	M1, M115, M154, 3565M, 15CMO, 2CMO, 3564M, M4	Revised	Previous State Filing Number: MUTA-130317969 Percent Rate Change Request: 3	2017 DC Rates.pdf, 2017 DC Rate Summary.pdf,

Mutual of Omaha Insurance Company Schedule of MONTHLY Base Rates For Policy Form 15CMO – DISTRICT OF COLUMBIA

PROPOSED RATES

UNISEX

AGE

All Ages 772.41

Mutual of Omaha Insurance Company Schedule of MONTHLY Base Rates For Policy Form 2CMO – DISTRICT OF COLUMBIA

PROPOSED RATES

UNISEX

AGE

All Ages 413.06

Mutual of Omaha Insurance Company Schedule of MONTHLY Base Rates For Rider Form 3564M – DISTRICT OF COLUMBIA When Attached to Policy Form 3564M

PROPOSED RATES

UNISEX

AGE

All Ages 198.03

Mutual of Omaha Insurance Company Schedule of MONTHLY Base Rates For Rider Form 3565M – DISTRICT OF COLUMBIA When Attached to Policy Form 3565M

PROPOSED RATES

UNISEX

AGE

All Ages 215.05

Mutual of Omaha Insurance Company Schedule of MONTHLY Base Rates For Policy Form M1 – DISTRICT OF COLUMBIA

PROPOSED RATES

UNISEX

ATTAINED AGE

Thru 69 361.25 70 - 74 441.93 75 - 79 483.02 80 & Over 528.67

Mutual of Omaha Insurance Company Schedule of MONTHLY Base Rates For Policy Form M115 – DISTRICT OF COLUMBIA

PROPOSED RATES

UNISEX

ATTAINED AGE

Thru 69 193.09 70 - 74 234.86 75 - 79 255.99 80 & Over 279.53

Mutual of Omaha Insurance Company Schedule of MONTHLY Base Rates For Policy Form M154 – DISTRICT OF COLUMBIA

PROPOSED RATES

UNISEX

ATTAINED AGE	
Thru 65	152.16
66	165.12
67	177.28
68	188.89
69	197.13
70	205.58
71	213.89
72	222.32
73	230.64
74	234.86
75	239.08
76	243.29
77	247.53
78	251.81
79	256.42
80 & Over	275.34

Mutual of Omaha Insurance Company Schedule of MONTHLY Base Rates For Policy Form M4 – DISTRICT OF COLUMBIA

PROPOSED RATES

UNISEX

ATTAINED AGE

Thru 69 379.64 70 - 74 467.39 75 - 79 511.87 80 & Over 561.44

MUTUAL OF OMAHA INSURANCE COMPANY PRE-STANDARDIZED MEDICARE SUPPLEMENT **DIST. COLUMBIA** SUMMARY OF RATE SCHEDULES

	DATE					
FORM	FORM APPROVED REVI			ISED RATE SCHEDULE		
M1	01/27/1982	M1	DC BASE RATE	08/12/2016 0015		
M115	11/04/1988	M115	DC BASE RATE	08/12/2016 0015		
M154	05/03/1990	M154	DC BASE RATE	08/12/2016 0015		
M4	12/03/1984	M4	DC BASE RATE	08/12/2016 0015		
15CMO	06/22/1979	15CMO	DC BASE RATE	08/12/2016 0015		
2CMO	03/06/1978	2CMO	DC BASE RATE	08/12/2016 0015		
3564M (51VB)	07/17/1973	3564M (51VB)	DC BASE RATE	08/12/2016 0015		
3565M (51VB)	07/17/1973	3565M (51VB)	DC BASE RATE	08/12/2016 0015		

SERFF Tracking #: MUTA-130803341 State Tracking #: Company Tracking #: AARON ZIMMER

 State:
 District of Columbia
 Filing Company:
 Mutual of Omaha Insurance Company

TOI/Sub-TOI: MS02I Individual Medicare Supplement - Pre-Standardized/MS02I.000 Medicare Supplement - Pre-Standardized

Product Name:2017 MOO PreStandardized Med SuppProject Name/Number:2017 Annual Rate Filing/2017 MOO

Supporting Document Schedules

Satisfied - Item:	Cover Letter All Filings
Comments:	
Attachment(s):	DC Cover Letter 2017.pdf
Item Status:	
Status Date:	
Bypassed - Item:	Certificate of Authority to File
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	
Satisfied - Item:	Actuarial Memorandum
Comments:	Activative moralitation
Attachment(s):	DC Memo 2017.pdf
Item Status:	Bo Memo 2017.pui
Status Date:	
Otatus Date.	
Satisfied - Item:	Actuarial Justification
Comments:	
Attachment(s):	2017 Actl Cert Neil.pdf 2017 DC Exhibit 1.pdf 2017 DC Exhibit 2 - 3.0%.pdf 2017 DC Exhibit 2A.pdf 2017 DC Exhibit 3.pdf 2017 DC Exhibit 3.pdf 2017 DC Exhibit 4 - Trend.pdf 2017 DC Exhibit 5.pdf 2017 DC Exhibit 5.pdf 2017 DC PERSISTENCY.pdf DC- Ex 6 Expense Assumption.pdf
Item Status:	
Status Date:	
Bypassed - Item:	District of Columbia and Countrywide Loss Ratio Analysis (P&C)
Bypass Reason:	See Actuarial Justification
Attachment(s):	
Item Status:	
Status Date:	

SERFF Tracking #:	MUTA-130803341	State Tracking #:		Company Tracking #:	AARON ZIMMER	
State:	District of Colum	nbia	Filing Company:	Mutual of Omaha I	Insurance Company	
TOI/Sub-TOI:	MS02I Individual Medicare Supplement - Pre-Standardized/MS02I.000 Medicare Supplement - Pre-Standardized					
Product Name:	2017 MOO PreStandardized Med Supp					
Project Name/Number:	2017 Annual Ra	te Filing/2017 MOO				
Bypassed - Item:		District of Columbia and Coun	ntrywide Experience for the Las	st 5 Years (P&C)		
Bypass Reason:	S	See Actuarial Justification				
Attachment(s):						
Item Status:						
Status Date:						
Bypassed - Item:	Α	Actuarial Memorandum and C	Certifications			
Bypass Reason:	S	See "Actuarial Memorandum"	and "Actuarial Justification" se	ections.		
Attachment(s):						
Item Status:						
Status Date:						
Dynasaad Itami		Initiad Data Davieur Templete	_			
Bypassed - Item:		Inified Rate Review Template	9			
Bypass Reason:	N	J/A				
Attachment(s):						
Item Status:						

Status Date:

MUTUAL of OMAHA INSURANCE COMPANY Mutual of Omaha Plaza Omaha, NE 68175 402 342 7600 mutualofomaha.com



November 11, 2016

Government of the District of Columbia Department of Insurance Insurance Products Division 810 First Street NE, Suite 701

NAIC #: 261-71412 FEIN #: 47-0246511

Re: 2017 Pre-Standardized Medicare Supplement Annual Loss Ratio Filing for policy and rider forms:

M1, M115, M154, M4, 2CMO, 15CMO, 3564M, 3565M

The enclosed filing has been prepared to demonstrate loss ratio compliance. The actuarial memorandum and certification support the loss ratio demonstrations and support our request for a 3.0% increase to be effective April 1, 2017.

Sincerely,

Aaron Zimmer

Lead Actuarial Analyst

7-Rerating

Phone: 402-351-2305

E-mail: aaron.zimmer@mutualofomaha.com

MUTUAL OF OMAHA INSURANCE COMPANY ACTUARIAL MEMORANDUM

District of Columbia

Re: 2017 Pre-Standardized Medicare Supplement Rate Revision and Annual Loss Ratio Filing

This filing has been prepared to demonstrate loss ratio compliance as required by the passage of the 1994 Technical Corrections (SSAA-94) to OBRA-90. The filing has been fashioned to follow the NAIC Medicare Supplement Insurance Model Regulations Compliance Manual.

General Description

Issuer Name: Mutual of Omaha Insurance Company (note: forms used in your state may include Pre-Standardized business issued by Aetna Life Insurance and Annuity Company and Allstate Insurance Company that has been assumptively reinsured by Mutual of Omaha Insurance Company)

Form Number: The form numbers are listed in the cover letter to this filing.

Policy Type: Pre-Standardized Medicare Supplement individual coverage; Forms issued prior to your state's adoption of the NAIC Standardized Benefit Packages or compliance with OBRA 1990 requirements.

Benefit Description: These forms provide benefits that supplement Medicare and meet or exceed the minimum standards required by your state.

Renewal Provision: The policy forms in this block are conditionally, collectively or guaranteed renewable. (Not all types of renewability may pertain to your individual state)

Marketing Method: The majority of this block was agent solicited but some forms were sold using direct response mail methods.

Underwriting Method: The majority of this block was underwritten with some forms issued non-selectively.

Pre-existing Condition Exclusion: The forms include a six-month pre-existing condition exclusion.

Issue Age Limits: These forms were issued to persons 65 and over.

Premium Basis: The amount of rate increase is determined by projecting the state experience under the assumptions listed below and then comparing the resulting loss ratio to the minimum allowable. Since Georgia experience is deemed not credible, national experience was used. Any indicated amount of rate increase for your state is listed in Exhibit 5.

Actuarial Certification: Certification of a qualified actuary, Neil Sandhoefner, ASA, CERA, MAAA, Actuarial Associate, is attached.

Domicile State Approval: A filing will be submitted to Nebraska, our state of domicile, in the near future.

Rates and Rating Factors: A set of proposed rates is enclosed.

Rate History: A history of revisions is shown in Exhibit 3.

Inforce Counts: Inforce counts since 1994 for your state and the nation are shown in Exhibit 1.

Average Annual Premium: Please refer to Exhibit 1.

Incurred Claims, Earned Premiums and Loss Ratios: The national data, past and future, is displayed in Exhibit 2. The statewide data is displayed in Exhibit 2A. The premiums in these exhibits have been adjusted to reflect past refunds.

Loss Ratio Compliance: Because prior to 1996 this block was rated based upon the national pooled experience, national experience is used to illustrate compliance with the original lifetime loss ratio. Credibility adjusted state experience is used to illustrate compliance with the future and 1996 plus future loss ratio requirements. Expected claims in relation to premiums, when combined with actual experience meet loss ratio requirements. Please refer to Exhibits 2 and 2A.

Future Loss Ratio Compliance: The proposed premiums are based on a target loss ratio of not less than 65%, which meets or exceeds the minimum allowable loss ratio for your state.

Projection Assumptions

Policy Persistency - The factor was developed from historical data.

Aging Factor – No additional premium is expected due to future step-rate adjustments.

Rate Increase Factor - Future premiums were increased to reflect the impact of the previous years' rate adjustment.

Average Exposures - Based on average inforce counts.

Loss Ratio Estimates - Loss ratio estimates are built from claims experience through September 30, 2016.

Trend – A 3.0% trend based on utilization and claim cost is assumed in the rating period. Rate increases are assumed to offset trend beyond the rating period. Support for the trend is displayed in Exhibit 4.

Interest - The original and subsequent rating did not include interest assumptions therefore the experience exhibits include 0% interest.

Credibility - Credibility factors were developed from the NAIC Refund/Credit Medicare Supplement Credibility Table and applied to the state and national loss ratios to derive a weighted average loss ratio.

Proposed Increase – Exhibit 5 displays the amount of increase to be implemented on 04/01/2017.

Any effort to expedite this filing will be appreciated. Phone calls and emails are welcomed.

Sincerely,

Aaron Zimmer

Lead Actuarial Analyst

7-Rerating

Phone: 402-351-2305

E-mail: aaron.zimmer@mutualofomaha.com

November 10, 2016

ACTUARIAL CERTIFICATION

COMPANY: Mutual of Omaha Insurance Company

RATE SUBMISSION: 2017 Pre-Standardized Medicare Supplement Annual Loss

Ratio Filing

DATE: November 2, 2016

I hereby certify that to the best of my knowledge and belief the above submission conforms to generally accepted actuarial principles, standards and guidelines, that the reserves and nonforfeiture benefits, if applicable, comply with all statutes, rules, and regulations of this state, and that premiums, if any, are not inadequate, excessive, unfairly discriminatory, or unreasonable in relation to benefits provided.

Zil Dog

SIGNATURE OF QUALIFIED ACTUARY

Neil Sandhoefner, ASA CERA, MAAA Actuarial Associate Mutual of Omaha Insurance Company

NAME/TITLE/BUSINESS AFFILIATION

MUTUAL OF OMAHA INSURANCE COMPANY Pre-Standardized Medicare Supplement Inforce Policy Count & Average Annual Premium

State: Dist. Columbia

Calendar	INFORCE COUNT	
Year	State	National
1981	181	389,964
1982	190	393,183
1983	197	387,960
1984	196	348,216
1985	198	310,906
1986	201	310,963
1987	227	332,235
1988	221	302,053
1989	187	258,193
1990	159	217,954
1991	131	188,035
1992	96	154,636
1993	85	118,975
1994	72	92,241
1995	63	70,672
1996	56	55,459
1997	34	43,355
1998	27	34,421
1999	27	27,694
2000	25	23,178
2001	20	19,388
2002	12	16,293
2003	9	13,733
2004	8	11,597
2005	8	9,944
2006	8	8,361
2007	8	7,068
2008	8	5,978
2009	7	5,077
2010	6	4,321
2011	5	3,576
2012	4	2,937
2013	4	2,405
2014	3	1,970
2015	2	1,574
2016	2	1,253

	Calendar	PAID PREMIUM		
	Year	State	National	
*	2016	9,788	3,467,395	

2016 AVERAGE ANNUAL PREMIUM			
State			
Before Rate Adjustment	After Rate Adjustment		
\$ 4,894	\$ 5,041		

^{*} Full year estimated using data through 09-30-2016.

State: NATIONAL

PAST EXPERIENCE:

Incurred	EARNED	INCURRED	INCURRED
Year	PREMIUM	CLAIMS	LOSS RATIO
1966	403,617	270,562	67.0%
1967	2,172,660	1,288,792	59.3%
1968	2,881,118	1,523,731	52.9%
1969	3,103,499	1,427,200	46.0%
1970	3,256,704	1,359,695	41.8%
1971	3,152,407	1,322,430	42.0%
1972	2,914,331	1,291,609	44.3%
1973	2,630,862	1,167,820	44.4%
1974	6,167,491	2,524,542	40.9%
1975	14,797,503	6,095,035	41.2%
1976	23,109,093	10,956,691	47.4%
1977	33,344,620	17,491,476	52.5%
1978	45,969,810	25,717,675	55.9%
1979	57,774,204	33,657,353	58.3%
1980	74,142,406	47,770,060	64.4%
1981	94,704,451	65,125,822	68.8%
1982	128,591,592	87,642,973	68.2%
1983	161,337,674	103,673,099	64.3%
1984	187,299,379	103,092,805	55.0%
1985	181,160,040	94,853,231	52.4%
1986	168,425,908	100,138,015	59.5%
1987	174,595,053	112,957,977	64.7%
1988	185,476,842	126,208,493	68.0%
1989	187,075,962	113,635,068	60.7%
1990	191,184,838	123,483,545	64.6%
1991	187,141,095	113,169,074	60.5%
1992	179,726,987	103,452,206	57.6%
1993	158,679,976	93,045,080	58.6%
1994	133,990,125	81,312,285	60.7%
1995	109,538,637	71,800,238	65.5%
1996	90,928,236	60,277,664	66.3%
1997	79,305,726	50,431,048	63.6%
1998	68,995,692	38,654,418	56.0%
1999	60,257,754	34,124,638	56.6%
2000	52,055,021	30,251,573	58.1%
2001	45,251,666	28,265,862	62.5%
2002	39,646,035	24,510,531	61.8%
2003	35,193,541	21,626,678	61.5%
2004	30,994,156	20,113,170	64.9%
2005	22,588,077	17,596,356	77.9%
2006	19,349,882	15,690,322	81.1%
2007	16,607,935	14,025,899	84.5%
2008	14,319,631	12,241,013	85.5%
2009	13,004,721	10,978,652	84.4%
2010	11,320,084	9,345,977	82.6%
2011	9,542,880	8,235,130	86.3%
2012	8,129,283	7,101,208	87.4%
2013	6,773,832	5,940,517	87.7%
2014	5,593,105	4,807,766	86.0%
2015	4,476,206	4,247,304	94.9%
2016	3,597,897	3,421,393	95.1%
TOTAL:	3,342,680,246	2,069,341,701	61.91%
IOIAL.	0,0-2,000,240	2,000,041,701	01.9176

FUTURE EXPERIENCE

Incurred	EARNED	INCURRED	INCURRED
Year	PREMIUM	CLAIMS	LOSS RATIO
2017	2,994,958	2,889,709	96.5%
2018	2,496,240	2,440,648	97.8%
2019	2,108,324	2,061,371	97.8%
2020	1,780,691	1,741,034	97.8%
2021	1,503,971	1,470,477	97.8%
2022	1,270,254	1,241,965	97.8%
2023	1,072,857	1,048,964	97.8%
2024	906,135	885,955	97.8%
2025	765,321	748,277	97.8%
2026	646,390	631,995	97.8%
2027	545,941	533,783	97.8%
2028	461,102	450,833	97.8%
2029	389,447	380,774	97.8%
2030	328,927	321,602	97.8%
2031	277,812	271,625	97.8%
TOTAL:	17,548,370	17,119,013	97.55%

LOSS RATIO DEMONSTRATION AND INDICATED RATE ADJUSTMENT:

PAST
FUTURE
LIFETIME

EARNED	INCURRED	BEFORE INCREASE	ANTICIPATED	AFTER INCREASE
PREMIUM	CLAIMS	LOSS RATIO	LOSS RATIO	LOSS RATIO
3,342,680,2	246 2,069,341,701	61.91%	N/A	61.91%
17,548,3	17,119,013	97.55%	65.00%	94.93%
3,360,228,6	2,086,460,714	62.09%	61.80%	62.08%
655,479,7	733 439,006,132	66.97%	65.00%	66.93%

EXHIBIT 2A

MUTUAL OF OMAHA INSURANCE COMPANY Pre-Standardized Medicare Supplement

State: Dist. Columbia

PAST EXPERIENCE:

Incurred	EARNED	INCURRED	INCURRED
Year	PREMIUM	CLAIMS	LOSS RATIO
1996	95,660	52,190	54.56%
1997	83,302	31,947	38.35%
1998	67,425	17,853	26.48%
1999	70,950	23,170	32.66%
2000	68,004	32,340	47.56%
2001	60,461	37,371	61.81%
2002	53,962	48,491	89.86%
2003	50,542	31,183	61.70%
2004	48,107	16,627	34.56%
2005	37,706	15,556	41.26%
2006	34,976	21,825	62.40%
2007	30,313	10,980	36.22%
2008	29,520	15,143	51.30%
2009	27,441	19,408	70.73%
2010	26,221	26,751	102.02%
2011	23,217	12,729	54.83%
2012	20,178	9,556	47.36%
2013	19,101	5,445	28.51%
2014	15,928	7,760	48.72%
2015	9,853	4,778	48.49%
2016	9,929	3,913	39.41%

PROPOSED RATE ADJUSTMENT:

3.0%

^{* 2016} EXPERIENCE IS ESTIMATED

^{**} INCREASE WAS BASED ON NATIONAL EXPERIENCE, SINCE STATE EXPERIENCE IS NOT CREDIBLE

Mutual of Omaha Insurance Company PreStandardized Medicare Supplement Rate Adjustment History Dist. Columbia

PLAN	TYPE	POLICY FORM	ISSUE DATES	IMPLEMENTATION DATES	INCREASE AMOUNT
ALL	PreStandardized Medicare Supplement			01/01/1991	18.50%
	• •			01/01/1992	15.00%
				01/01/1993	12.50%
				04/01/1994	10.00%
				07/01/1996	14.00%
				11/01/1997	16.00%
				01/01/1998	15.00%
				02/01/1999	13.50%
				07/01/2001	7.00%
				07/01/2002	9.00%
				07/01/2003	8.00%
				07/01/2004	7.00%
				03/01/2009	6.50%
				04/01/2010	6.50%
				04/01/2011	10.00%
				04/01/2016	3.00%

Exhibit 4

Mutual of Omaha Insurance Company

Pre-Standardized Medicare Supplement

Trend Analysis

					Net
				Claim Costs	Claim
Incurred		Incurred	Claim	Net of Age	Cost
Year	Exposures	Claims	Costs	Changes	Trend
2005	10,771	17,596,356	1,634	1,634	
2006	9,153	15,690,322	1,714	1,714	4.9%
2007	7,715	14,025,899	1,818	1,818	6.1%
2008	6,523	12,241,013	1,877	1,877	3.2%
2009	5,528	10,978,652	1,986	1,986	5.8%
2010	4,699	9,345,977	1,989	1,989	0.1%
2011	3,949	8,235,130	2,086	2,086	4.9%
2012	3,257	7,101,208	2,181	2,181	4.6%
2013	2,671	5,940,517	2,224	2,224	2.0%
2014	2,188	4,807,766	2,198	2,198	-1.2%
2015	1,772	4,247,304	2,397	2,397	9.1%
2016	1,414	3,430,105	2,427	2,427	1.2%

Proposed Trend 3.0%

MUTUAL OF OMAHA INSURANCE COMPANY Pre-Standardized Medicare Supplement Proposed Rate Adjustments by Plan

Dist. Columbia

POLICY FORMS	OVERALL RATE ADJUSTMENT
ALL	3.0%

MUTUAL OF OMAHA INSURANCE COMPANY NATIONAL PERSISTENCY ANALYSIS

YEAR	INFORCE COUNT	PERSISTENCY
1994	92,241	
1995	70,672	0.766
1996	55,459	0.785
1997	43,355	0.782
1998	34,421	0.794
1999	27,694	0.805
2000	23,178	0.837
2001	19,388	0.836
2002	16,293	0.840
2003	13,733	0.843
2004	11,597	0.844
2005	9,944	0.857
2006	8,361	0.841
2007	7,068	0.845
2008	5,978	0.846
2009	5,077	0.849
2010	4,321	0.851
2011	3,584	0.829
2012	2,937	0.819
2013	2,405	0.819
2014	1,970	0.819
2015	1,574	0.799

AVERAGE:

0.824

Exhibit 6

MUTUAL OF OMAHA INSURANCE COMPANY Pre-Standardized Medicare Supplement District of Columbia Expense Assumptions

Type of Expense	Pre-Standardized
Commissions	20.0%
General Expenses	10.0%
Premium Tax	2.0%
Risk Charge	3.0%
Total	35.0%